

REMARKS

Claims 1-6, 8-14, and 16-28 are pending.

Claims 1-6, 8-14, and 16-28 stand rejected.

Claims 1, 10, and 17 have been amended.

Claims 29-34 have been amended.

Claim Rejections - 35 U.S.C. § 102

Claims 1-4, 6, 8-12, 14, 17, 19-22, 24, and 26-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 20020178161 to Brezin et al. (referred to herein as “*Brezin*”). Applicant respectfully traverses the rejection.

Brezin relates to:

A method and apparatus for optimizing information-retrieval related system performance based on users' communication relationships. Users' interactions and relationships with each other are tracked by a 'relationship analyzer' that queries multiple heterogeneous information sources, such as e-mail logs, organization charts, calendar entries, phone logs, etc. A data structure is created for each user reflecting the intensity of communication relationship with other users, and modified over time as the data in the information sources change. *Brezin*, Abstract.

The purpose of *Brezin* is “to improve system performance in a variety of ways: for example, to shorten retrieval time, to resolve missing or ambiguous results, to prioritize information for downloading to limited-resource computing devices, or to propagate updated information among closely related users.” *Id.*

Although *Brezin* teaches “optimizing information-retrieval [] based on users' communication relationships” [*Id.*, Abstract], Applicant respectfully submits that *Brezin* fails to teach or suggest “**storing in a memory data associated with multiple members of the organization, wherein the data includes data that directly states one or more areas of expertise** for the multiple members of the organization and the target individual is one of the multiple members of the organization”, “processing the data that directly states the one or more areas of expertise for the multiple members of the organization to identify at least the target individual of the organization, wherein the data associated with

the target individual states that the target individual has expertise in the area of expertise desired by the first member of the organization” AND “selecting a contact path ... and the contact path identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact a member of the organization having the desired expertise indicated in the memory.”
Claim 1.

“[I]dentifying an area of expertise desired by the first member” and having a contact path that “identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact a member of the organization having the desired expertise” as recited by Claim 1 is clearly not the purpose of the teachings of *Brezin*.

However, the Examiner submits that despite having different purposes, nevertheless *Brezin* does teach amended Claim 1, which incorporates elements of cancelled Claim 7.

Paragraphs 76-81 of *Brezin* teach that “to further refine the derived relation group DRG(x), the RA [Relationship Analyzer] preferably computes a “subject-specific relationship” RiS(is, x,y,sub) where “is” is an information source such as one of the list above and “sub” is the contents of the “subject” field (or other text content or description) of the communication (e.g., e-mail).” The Examiner states that “Associating a subject with a user is indicative of assigning an implied expertise, e.g., based on the subject, to each user.” Office Action, p. 4.

Applicant respectfully submits that although computing a subject-specific relationship from communications may help correlate communications for the derived relation group, **a subject-specific relationship** is NOT **“storing in a memory data associated with multiple members of the organization, wherein the data includes data that directly states one or more areas of expertise** for the multiple members of the organization and the target individual is one of the multiple members of the organization”, “processing the data that directly states the one or more areas of expertise for the multiple members of the organization to identify at least the target individual of

the organization, wherein the data associated with the target individual states that the target individual has expertise in the area of expertise desired by the first member of the organization” as required by claim 1.

Furthermore, *Brezin* teaches that “the query modification component is given as input a query ‘Q’ to an information source ‘S’ on behalf of a user ‘U1’ about a user ‘U2.’ *Brezin*, para. 0088. “A sub-query could also be added to request the availability of other users in user U’s derived relation group.” *Id.* Thus, user ‘U2’ is an ‘intervening’ link between user ‘U1’ and the “other users” in user U2’s derived relation group. Thus, the ‘other users’ are at the end of a contact path. **However, *Brezin* does not teach that the ‘other users’ are identified by any area of expertise. They are only identified because they are in user ‘U2’s’ derived relation group.** The contact path in Claim 1 is “between the first member of the organization and the target individual, the contact path including one or more members of the organization.” Thus, in Claim 1, the end of the contact path is the target individual. However, unlike the ‘other users’ of *Brezin* at the end of the contact path in *Brezin*, Claim 1 recites “processing the data that directly states the one or more areas of expertise for the multiple members of the organization to identify at least the target individual of the organization.”

Thus, Applicants respectfully submit that *Brezin* fails to teach or suggest the invention of Claim 1.

For at least reasons similar to those regarding Claim 1, Applicant respectfully submits that *Brezin* also fails to teach or suggest:

Claim 10:

a memory to store data associated with multiple members of the organization, wherein the data includes data that directly states one or more areas of expertise for the multiple members of the organization; ... and

a people network model module interfaced with the communications network and interfaced with the memory; ... and

a target locator module interfaced with the people network model and the interaction level analyzer module, the target locator module operable to accept a query from a first member for members of the

organization having a desired expertise, to process the data that directly states the one or more areas of expertise for the multiple members of the organization to identify at least one or more target individuals of the organization, wherein the data associated with each target individual states that each target individual has expertise in an area of expertise desired by the first member of the organization, and to provide the first member with one or more target individuals based on the desired expertise and the level of interaction of the first member with members of the organization.

Claim 17:

storing in a memory data associated with multiple members of the organization, wherein the data includes data that directly states one or more areas of expertise for the multiple members of the organization and the target individual is one of the multiple members of the organization

processing the data that directly states the one or more areas of expertise for the multiple members of the organization to identify one or more target individuals of the organization, wherein the data associated with each target individual states that the target individual has expertise in the subject matter;

selecting as target individuals only the identified members having at least a predetermined level of electronic communication interaction with the first member and the expertise in the subject matter as stated in the data associated with each target individual; and

providing the first member with at least one contact path to each of the target individuals.

Applicant respectfully requests withdrawal of the rejection of independent Claims 1, 10, and 17.

Applicant respectfully submits that dependent Claims 2-4, 6-9, 11, 12, 14, 15, 19-22, 24, and 26-34 are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Claim Rejections - 35 U.S.C. § 103

Claims 5, 13, and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brezin as applied to claims 3, 11 and 19.

Claims 16, 18, and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brezin as applied to claims 15, 17 and 19, in view of U.S. Patent Publication No. 20020059201 to Work (referred to herein as “*Work*”).

Applicant respectfully traverses the rejections.

Applicant respectfully submits that Claims 5, 13, 16, 18, 23, and 25 are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Applicant respectfully submits that claims 26-28 are allowable over the cited references. As for example depicted in Figures 7A and 7B, *Brezin* discloses a direct relationship between one individual and another. Applicant respectfully submits that *Brezin* neither teaches nor suggests a “contact path includes at least one intervening member of the organization between the first member and the target individual” as recited in Claims 26-28.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

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Respectfully submitted,

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